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Attorneys for Plaintiff
Diana Van Bree

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DIANA VAN BREE,)
)
Plaintiff,)
)
vs.)
)
JT4, LLC, a Delaware Limited)
Liability Company,)
)
Defendant.)

Case No. 2:20-cv-00788-CDS-VCF

DIANA VAN BREE,)
)
Plaintiff,)
)
vs.)
)
FRANK KENDALL III, SECRETARY,)
UNITED STATES AIR FORCE,)
)
Defendant.)

Case No. 2:20-cv-01038-CDS-VCF

**STIPULATION AND REQUEST FOR
EXTENSION OF TIME TO FILE A
REVISED JOINT DISCOVERY PLAN
AND SCHEDULING ORDER**

1 In accordance with LR IA 6-1, Plaintiff Diana Van Bree (“Plaintiff”), Defendant JT4, LLC
2 (“JT4”), and Defendant United States Air Force (“Air Force”), by and through their respective
3 counsel, hereby stipulate and request a brief extension of time to meet and confer and submit a
4 Proposed Revised Joint Discovery Plan and Scheduling Order pursuant to the Court’s Order (ECF
5 No. 79). For the following reasons, the parties respectfully request an additional thirty (30) days to
6 submit a Revised Joint Discovery Plan and Scheduling Order. This is the first stipulation for
7 extension of time to submit a Revised Joint Discovery Plan and Scheduling Order.
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9 On September 14, 2023, the Court issued an Order on Stipulation for Stay and Referral to
10 Settlement Conference. In that Order, the parties are required to meet and confer, and submit a
11 Revised Joint Discovery Plan and Scheduling Order for this Court’s consideration and approval
12 within twenty-one (21) days following the conclusion of any scheduled settlement conference to if
13 no settlement resolution was reached. The parties participated in a settlement conference on
14 November 29, 2023, which resulted in an impasse. As such, the deadline for the parties to submit a
15 Revised Joint Discovery Plan and Scheduling Order is currently December 20, 2023.
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18 The parties require an additional thirty (30) days, or until January 19, 2024, to meet and
19 confer, and submit a Revised Joint Discovery Plan and Scheduling Order due to a variety of
20 reasons. Counsel for the U.S. Air Force is currently out of the office through around January 2,
21 2024, and Counsel for Ms. Van Bree, Gary Gilbert, is also out of the office through the first week
22 of January 2024. Additionally, Counsel for JT4, LLC, is currently ill and out of the office. Finally,
23 although the parties began the meet and confer process prior to today, Counsel for Ms. Van Bree,
24 James Hill, has had limited availability over the prior few weeks due to a 4-day hearing, occurring
25 between December 11-14, 2023, for a separate case. As such, this request for extension is made in
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1 good faith and with good cause shown, and is not intended to cause unnecessary delay in the
2 processing of this matter.

3 Therefore, for the aforementioned reasons, the parties respectfully request an extension of
4 **thirty (30) days, or until January 19, 2024**, to meet and confer, and submit a Revised Joint
5 Discovery Plan and Scheduling Order for this Court's consideration.

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1 DATED: December 20, 2023

2 /s/James A. Hill

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8 AND

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14 *Counsel for Plaintiff Diana Van Bree*

15 /s/Patrick A. Rose, for Skyler H. Pearson

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21 *Counsel for Defendant Frank Kendall III,*
22 *Secretary, United States Air Force*


/s/Hilary A. Williams

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Counsel for Defendant JT4, LLC

23 **ORDER**

24 IT IS SO ORDERED _____, December 21, 2023

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28 U.S. Magistrate Judge